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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF ESTELLE G. TEITELBAUM; and
RUTH WASHTON, in her capacity as Personal
Representative of the Estate of Estelle G.
Teitelbaum,

Defendants.

Adv. Pro. No. 10-04836 (SMB)

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL
OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), by and through his counsel, Baker & Hostetler LLP, and defendants Estate of Estelle G. Teitelbaum and Ruth Washton in her Capacity as Personal Representative of the Estate of Estelle G. Teitelbaum (“Defendants”), by and through their counsel, Kudman Trachten Aloe LLP (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 1, 2010, the Trustee filed and served the Complaint against Estelle G. Teitelbaum.
2. On January 6, 2012, a Statement Noting Death of Estelle G. Teitelbaum was filed.
3. On August 14, 2012, a Stipulation for Substitution of Defendant and Order was filed, substituting Estate of Estelle G. Teitelbaum and Ruth Washton in her Capacity as Personal Representative of the Estate of Estelle G. Teitelbaum as defendants.
4. On April 25, 2014, Defendants Estate of Estelle G. Teitelbaum and Ruth Washton in her Capacity as Personal Representative of the Estate of Estelle G. Teitelbaum served an answer on the Trustee.
5. On February 26, 2015, the Parties entered into a settlement agreement pursuant to the Settlement Procedures Order entered by this Court on November 12, 2010 [Dkt. No. 3181].
6. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with

prejudice of the Trustee's claims against Defendants in the above-captioned adversary proceeding and dismissing the adversary proceeding.

7. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

8. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

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Dated: March 23, 2015

BAKER & HOSTETLER LLP

By: /s/Nicholas J. Cremona

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*Attorneys for Defendants Estate of Estelle G.
Teitelbaum and Ruth Washton in her Capacity as
Personal Representative of the Estate of Estelle G.
Teitelbaum*

SO ORDERED

Dated: March 25th, 2015
New York, New York

/s/ STUART M. BERNSTEIN
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE